

Matthew Knepper, Esq.

Nevada Bar No. 12796

David Krieger, Esq.

Nevada Bar No. 9086

NEVADA BANKRUPTCY ATTORNEYS, LLC

5502 S Fort Apache Road, Suite 200

Las Vegas, NV 89148

Phone: (702) 848-3855

Fax: (702) 660-4130

Email: info@nvbankruptcyattorneys.com

Attorneys for Appellants

JEFFREY LEE TINDALL and CARMELITA AGARAN TINDALL

E-FILED: 12/20/2022

<p>JEFFREY LEE TINDALL and CARMELITA AGARAN TINDALL,</p> <p style="text-align: center;">Appellants,</p> <p style="text-align: center;">v.</p> <p>AMERICAN EXPRESS NATIONAL BANK,</p> <p style="text-align: center;">Appellee.</p>	<p>Case No: BKS-21-14900-gs Chapter 13</p> <p>USDC Case # 2:22-cv-01700-GMN Appeal Ref. # 22-26</p> <p style="text-align: center;">APPELLANTS’ MOTION AND PROPOSED ORDER TO EXTEND TIME TO FILE OPENING BRIEF AND TO EXTEND ALL REMAINING BRIEFING DEADLINES</p> <p style="text-align: center;">[SECOND REQUEST]</p>
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COMES NOW Appellants Jeffrey Lee Tindall and Carmelita Agaran Tindall (“Appellants”), by and through their counsel of record, and for its Motion to Extend Time for Appellants to File their Opening Brief and to extend all briefing deadlines stat and allege as follows:

1. On September 22, 2022, the Court entered an Order Denying Debtors Jeffrey Lee Tindall and Carmelita Agaran Tindall’s Objection to Proof of Claim No. 3 in US Bankruptcy Court, Case No. 21-14900-gs [Dkt. 82].

2. On October 6, 2022, the Debtors filed a Notice of Appeal. [Dkt. 85].

3. On October 12, 2022, the matter was transferred to the U.S. District Court, of Nevada, USDC Appeal Court Case# 22-cv-01700-GMN Appeal Reference # 22-26 [Dkt. 95].

4. On November 7, 2022, the Court ordered that Appellants' Opening Brief is due by November 21, 2022; that Appellee's deadline to file their Response Brief is due by December 5, 2022, and that the Reply Brief is due by December 19, 2022.

5. On November 21, 2022, the Appellants filed a motion for an extension of time to file their Opening Brief.

6. On December 9, 2022, the Court granted the Appellants' Motion to Extend Time to File their Opening Brief and ordered that the Appellants' Opening Brief is due by December 21, 2022; that Appellee's deadline to file their Response Brief is due by January 21, 2023, and that the Reply Brief is due by February 21, 2023.

7. Due to the holiday schedule and family commitments, Appellants request additional time to file their Opening Brief in thirty days in order to allow Appellants additional time to consider the facts and circumstances of the pending briefing, and to extend Appellee's deadline to file an Answering Brief for thirty days for the same reasons. As a result, the Parties hereby request this Court to further extend the date for Appellants to file their Opening Brief until **January 20, 2023**, and to extend the date for Appellee to file their Answering Brief until **February 20, 2023**, and further request this Court to further extend the date for Appellants to file their Reply Brief until **March 22, 2023**.

8. This motion is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

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WHEREFORE, Appellants pray for an Order of the Court granting thirty (30) additional days for Appellants to file their Opening Brief until **January 20, 2023**, and for Appellee to file their Answering Brief until **February 20, 2023**, and for Appellants to file their Reply Brief until **March 22, 2023**.

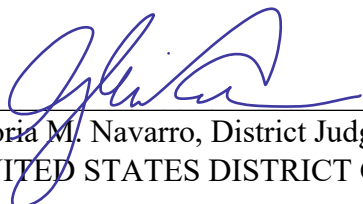
Respectfully Submitted on: December 20, 2022.

	<p>NEVADA BANKRUPTCY ATTORNEYS LLC</p> <p><i>/s/ David Krieger, Esq.</i></p> <hr/> <p>David Krieger, Esq. Nevada Bar No. 9086 Matthew Knepper, Esq. Nevada Bar No. 12796 5940 S. Rainbow Blvd., Suite 400 PMB 99721 Las Vegas, NV 89118 dkrieger@nvbankruptcyattorneys.com mknepper@nvbankruptcyattorneys.com</p> <p><i>Counsel for Appellants Jeffrey Lee Tindall and Carmelita Agaran Tindall</i></p>
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ORDER GRANTING
APPELLANTS' MOTION AND PROPOSED ORDER TO EXTEND TIME TO FILE
OPENING BRIEF AND TO EXTEND ALL REMAINING BRIEFING DEADLINES

IT IS SO ORDERED.

Dated this 4 day of January, 2023.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT